

Vaughn A. Crawford, Esq.
Nevada Bar No. 7665
Dawn L. Davis, Esq.
Nevada Bar No. 13329
Morgan T. Petrelli, Esq.
Nevada Bar No. 13221
SNELL & WILMER L.L.P.
1700 South Pavilion Center Drive, Suite 700
Las Vegas, Nevada 89135
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
Email: ddavis@swlaw.com
vcrawford@swlaw.com
mpetrelli@swlaw.com

Attorneys for Defendant Ford Motor Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA BRIDENBAUGH,
INDIVIDUALLY; and JOHN
BRIDENBAUGH, Individually,

Plaintiffs,

v.

FORD MOTOR COMPANY, a Delaware
Corporation, DOES 1 Through 20; and ROE
BUSINESS ENTITIES 1 Through 20

Defendant.

Case No.: 2:24-cv-00188-GMN-BNW

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

(THIRD REQUEST)

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs MARIA BRIDENBAUGH and JOHN BRIDENBAUGH and Defendant FORD MOTOR COMPANY, by, and through their respective undersigned counsel of record, pursuant to LR II 26-3, that discovery and related deadlines be extended. This is the Parties' **Third Request** for a continuance of discovery deadlines.

I. Discovery Completed to Date:

Parties have conducted depositions of each party and have inspected and tested the vehicle at issue. Parties have exchanged written discovery requests and responses, have made multiple

Rule 26 disclosures and issued multiple subpoenas. Further, the parties have deposed Plaintiff Maria's burn doctor provider and made initial expert disclosures.

II. Discovery that Remains to be Completed:

Plaintiffs have noticed the depositions of several third parties to occur over the next few months and continue to seek relevant information through written and other discovery means. Supplemental and rebuttal expert reports and expert depositions remain to be completed.

III. Reasons Why the Parties are Requesting Extension:

The parties continue to work diligently to meet the current deadlines. Discovery is ongoing, discovery disputes are attempting to be resolved, and the parties are cooperating otherwise in good faith. The request for a short, two-week continuance of the rebuttal expert disclosure deadline and the discovery cutoff date is made because counsel for Ford will be out of the jurisdiction during the current rebuttal expert disclosure deadline and needs additional time to properly disclose rebuttal expert witness disclosures.

IV. Proposed Discovery Schedule:

The parties propose the following discovery deadlines:

<u>Discovery</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Initial Expert Disclosures (Plaintiffs)	November 12, 2024	No change
Initial Expert Disclosures (Defendant)	December 13, 2024	No change
Add Parties/Amend Pleadings	May 12, 2025	No change
Rebuttal Expert Disclosures	July 10, 2025	July 24, 2025
Close of Discovery	August 11, 2025	August 25, 2025
Dispositive Motions	September 12, 2025	September 24, 2025
Joint Pretrial Order	October 13, 2025	October 27, 2025

1 IT IS SO AGREED AND STIPULATED, THROUGH COUNSEL OF RECORD.

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3 **SNELL & WILMER L.L.P.**

BERTOLDO CARTER SMITH & CULLEN

4 /s/ Dawn L. Davis
5 Vaughn A. Crawford, Esq.
6 Nevada Bar No. 7665
7 Dawn L. Davis, Esq.
8 Nevada Bar No. 13329
9 Morgan T. Petrelli, Esq.
10 Nevada Bar No. 13221
11 1700 South Pavilion Center Drive, Suite 700
12 Las Vegas, Nevada 89135

/s/ Brett Carter
Brett A. Carter, Esq.
Nevada Bar No. 5904
Cliff W. Marcek, Esq.
Nevada Bar No. 5061
7408 W. Sahara Avenue
Las Vegas, Nevada 89117
Attorneys for Plaintiffs

*Attorneys for Defendant Ford Motor
Company*

ORDER

13 IT IS SO ORDERED.

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16 UNITED STATES MAGISTRATE JUDGE

17 DATED: March 18, 2025

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Snell & Wilmer

L.L.P.
LAW OFFICES
1700 South Pavilion Center Drive, Suite 700
Las Vegas, Nevada 89135
702.784.5200